

UNITED STATES DISTRICT COURT
for the

United States of America)
v.)
)
Julie Winters) Case No. 3:25-mj-00175
)
)
)
Defendant(s)

SEALED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 24, 2025 in the county of Multnomah in the
District of Oregon, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 111(a)(1)	Attempted Assault of a Federal Officer

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

/s/ By Phone
Complainant's signature

[REDACTED], Special Agent, FBI
Printed name and title

Sworn via telephone at 6:22 pm pursuant to Fed. R. Crim. P. 4.1.

Date: June 25, 2025

Youlee Yim You
Judge's signature

City and state: Portland, Oregon

Hon. Youlee Yim You
Printed name and title

SEALED

DISTRICT OF OREGON, ss: AFFIDAVIT OF [REDACTED]

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, [REDACTED], being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since February 2023. My current assignment is with the FBI Portland Field Office, Counterintelligence, investigating a variety of criminal and national security matters. These include the investigation of violent crimes and major offenses such as threats to human life, threats to national infrastructure, efforts to collect, gather, and share national defense information and other criminal matters. My training and experience include a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting criminal complaints, and probable cause.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Julie Winters for Attempted Assault of a Federal Officer and inflicting bodily injury in violation of 18 U.S.C. § 111(a)(1) and (b). As set forth below, there is probable cause to believe, and I do believe, that Winters committed Attempted Assault of a Federal Officer, in violation of 18 U.S.C. § 111(a)(1) and (b).

3. The facts set forth in this affidavit are based on the following: my own personal knowledge; information obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communication with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable
Affidavit of [REDACTED]

cause in support of the application for an arrest warrant, it does not set forth each fact that I or others have learned during this investigation.

Applicable Law

4. 18 U.S.C. § 111(a)(1) makes it an offense to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in 18 U.S.C. § 1114 while engaged in or on account of the performance of official duties. Persons designated in § 1114 include any officer or employee of the United States or of any agency in any branch of the United States government while such officer or employee is engaged in or on account of the performance of official duties, and any person assisting such an officer or employee in the performance of official duties. Under § 111(a), simple assault is a misdemeanor, but where the assaultive acts involve physical contact with the victim, the offense is a felony punishable by imprisonment up to 8 years. Assaulting a federal officer which results in bodily injury is punishable by up to 20 years' imprisonment. The statute does not define "bodily injury" however 18 U.S.C. § 1365(h)(4) has been interpreted to define bodily injury to mean: (A) a cut, abrasion, or bruise, (B) physical pain, or (C) any other injury to the body, no matter how temporary.

Statement of Probable Cause

June 2025: Protests at the Portland ICE Building

5. Over the course of numerous weeks starting in May 2025 and continuing through June 24-25, 2025, protesters assembled in front of and around the Immigration and Customs Enforcement (ICE) building in the South Waterfront neighborhood of Portland, Oregon. The ICE building is located at 4310 SW Macadam Avenue, with access to the building on South Boundary Street. During daylight hours, some of the attendees at the demonstration have harassed both ICE clients and employees by following them with cameras making disparaging

Affidavit of [REDACTED]

remarks and threatening statements, including stating that they know where the target lives or that they will find the target of the harassment. Many of these individuals dress in all black clothing, commonly referred to as “black bloc.” Black bloc can prevent identification of individual actors by authorities. After nightfall, the attendees generally become more aggressive, damaging personal and government property, and throwing items toward federal law enforcement officers working at the building. The violence toward officers has included discharging pepper spray at officers as well as throwing rocks, trash, and bricks pulled from the ICE facility’s driveway.

June 24, 2025: Protesters Became Destructive on Federal Property

6. On June 24, 2025, at approximately 11:00pm, protestors started to become more aggravated. Two protestors brought an American flag onto the driveway of the ICE building and attempted to light it on fire. At this point, Federal Protective Service (FPS) officers and Immigration and Customs Enforcement (ICE) – Enforcement and Removal Operations (ERO) Officers engaged the protestors with less than lethal means.

WINTERS Attempted to Assault a Federal Officer

7. At approximately 11:15pm, FPS officers observed an individual attempting to light an incendiary device next to the guard shack of the ICE building.¹ The individual was later identified as Julie WINTERS. WINTERS backed away from the guard shack towards the trolley track. FPS officers engaged WINTERS for attempting to light the incendiary device. As WINTERS reached the street, she reached into her backpack and pulled out a large knife, approximately 1 foot in length, with a curved blade. WINTERS began waving the blade around

¹ WINTERS attempt to light an incendiary device is still under investigation.

towards and at FPS officers. WINTERS began to move several feet to her left. As officers attempted to get tactically positioned, WINTERS threw the knife at one of the officer's heads. The officer was able to dodge the knife by moving his head and body. The knife did not strike the officer. I would conservatively estimate WINTERS was only five to ten feet away from the FPS officer when she threw the knife at the officer. WINTERS began to run away and an officer deployed a taser. WINTERS was immobilized. WINTERS continued to resist and was reaching towards her waist while officers were attempting to place WINTERS in custody. One officer saw WINTERS grab another knife and the officer kicked the knife away from WINTERS. The officer described the additional knife as a kitchen butcher knife. Officers made a second sweep after securing WINTERS in a holding cell and were able to locate the first knife that WINTERS threw. Officers located a second knife in WINTERS' possession.²

8. WINTERS was wearing a mask with metallic/glass objects on it. A photo of the mask WINTERS wore is below after officers seized it.



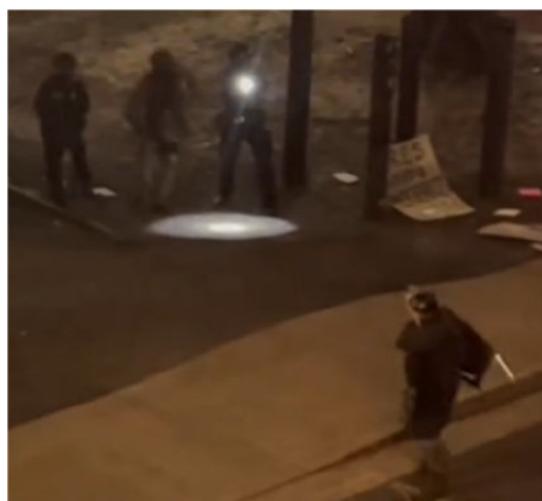
² I am not certain whether WINTERS possessed three knives or if the second knife kicked out of her hand was the knife with a white handle pictured below.

Instagram Post by _thatblasianthooo

9. On June 25, 2025, Instagram user _thatblasianthooo posted a video that showed the incident occurring between FPS, ICE, and WINTERS. Below is a screen shot from the Instagram video showing WINTERS wielding the knife in her right hand. The photo on the right has the same screenshot, but has the knife outlined in a red circle.



10. The below screenshot shows WINTERS after she swung the knife towards officers and brought the knife back behind her.



11. The below is a screenshot from the video when WINTERS throws the knife at the FPS officer with her left hand. The screenshot on the right highlights the knife as it went towards the FPS officer.



12. Below are photos of the knife that Winters threw at the officer and was retrieved by FPS officers.



13. Below is the second knife with a white handle that WINTERS had in her backpack that was located in its sheath. I do not know if this was the knife an officer kicked out of WINTERS' hand.



14. Below is a photo of WINTERS after she was arrested by FPS officers.



15. An FPS supervisor and myself attempted to interview WINTERS. When asked if she was willing to talk, WINTERS stated that she had nothing to say. WINTERS then said that she did nothing wrong, she lived across the street and she was trying to go to sleep when bombs continued to go off across the street. WINTERS stated that she came out, was tased and beaten up. When asked again if agents can move her to an interview room, WINTERS said that she had nothing else to say.

Conclusion

16. Based on the foregoing, I have probable cause to believe, and I do believe, that Julie WINTERS committed Attempted Assault of a Federal Officer in violation of 18 U.S.C. § 111(a)(1) and (b). I therefore request that the Court issue a criminal complaint and arrest warrant for Julie WINTERS.

17. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney Lewis Burkhart, and AUSA Burkhart advised me that in their opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

18. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or

otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

By phone pursuant to Fed. R. Crim. P. 4.1

[REDACTED]
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at

6:22 p.m. on June 25, 2025.

Youlee Yim You
HONORABLE YOULEE YIM YOU
United States Magistrate Judge